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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-0199 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME UNDER
v.)	THE SPEEDY TRIAL ACT, 18 U.S.C. §
)	3161 <u>ET SEQ.</u>
CALVIN LAWRENCE,)	
)	
Defendant.)	
)	

Plaintiff United States of America, by and through its attorney of record, and defendant Calvin Lawrence ("defendant"), by and through his attorney of record, hereby stipulate as follows:

1. On May 16, 2012, defendant appeared before the Honorable Edward M. Chen, United States District Judge, and the matter was continued to May 30, 2012 at 2:30 p.m. For the reasons stated in open court on May 16, 2012, and with defendant's consent, the Court excluded time under the Speedy Trial Act from May 16, 2012 through May 30, 2012 to provide the defense lawyer with additional time for investigation and for effective preparation.

3. The parties stipulate and agree that this matter should be continued to May 30, 2012 at 2:30 p.m. and that the failure to grant such a continuance would unreasonably deny counsel the

1 reasonable time necessary for effective preparation, taking into account the exercise of due
2 diligence. The parties further stipulate and agree that the time from May 16, 2012 through May 30,
3 2012 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §
4 3161(h)(7)(A), on the basis that the ends of justice are served by taking such action which outweigh
5 the best interest of the public and the defendant in a speedy trial and also under subsection (B)(iv)
6 for effective preparation of counsel, taking into account the exercise of due diligence.

7 Dated: May 17, 2012

Respectfully submitted,

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9 MELINDA HAAG
United States Attorney

10
11 /s/
DEBORAH R. DOUGLAS
Assistant United States Attorney

12
13 Dated: May 17, 2012

14 /s/
ELIZABETH FALK
Assistant Federal Public Defender
Attorney for Defendant Calvin Lawrence

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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)

14 Plaintiff,)

15 v.)

16 CALVIN LAWRENCE,)

17 Defendant.)
18 _____)

No. CR 12-0199 EMC

ORDER EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT, 18 U.S.C. § 3161 ET
SEQ.

19 GOOD CAUSE APPEARING, as the Court found on May 16, 2012, and based upon the
20 parties' stipulation, IT IS HEREBY ORDERED that the time from May 16, 2012 through May 30,
21 2012 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C.
22 §§ 3161(h)(7)(A) and (B)(iv), to provide the defense lawyer with additional time for investigation
23 and for effective preparation. The Court finds that (A) failure to grant the continuance would
24 unreasonably deny defendant the reasonable time necessary for effective preparation, taking into
25 account the exercise of due diligence; and (B) the ends of justice served by the continuance

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27 //

1 outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C.
2 § 3161(h)(1)(7)(A) & (B)(iv).

3
4 **IT IS SO ORDERED.**

5 18
6 Dated: May ___, 2012

